

Bradford J. Sandler (NY Bar No. 4499877)
Ilan D. Scharf, Esq. (NY Bar No. 4042107)
Jason S. Pomerantz, Esq. (CA Bar No. 157216)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777

Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re: ROCHESTER DRUG CO-OPERATIVE, INC. Debtor.
Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST, Plaintiff, v. GALDERMA LABORATORIES, L.P. Defendant.

Chapter 11

Case No. 20-20230 (PRW)

Adv. Proc. No. 22-02027 (PRW)

THIRD STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc. (“Debtor”), and defendant, Galderma Laboratories, L.P. (“Defendant” and, together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;
and

WHEREAS, on February 25, 2022, the Parties entered into a stipulation (the "First Stipulation") by which the time required for Defendant to answer the Complaint was extended through and including April 15, 2022. The First Stipulation was approved by order entered February 28, 2022.

WHEREAS, on April 8, 2022, the parties entered into a stipulation (the "Second Stipulation") by which the time required for Defendant to answer the Complaint was further extended through and including June 15, 2022. The Second Stipulation was approved by order entered April 11, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject to Court approval, to further extend the time for the Defendant to answer the Complaint to and including July 15, 2022.

[Remainder of Page Intentionally Left Blank]

2. All other terms set forth in the First Stipulation and Second Stipulation remain in full force and effect.

Dated: June 8, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

Bradford J. Sandler (NY Bar No. 4499877)

Ilan D. Scharf (NY Bar No. 4042107)

Jason S. Pomerantz (CA Bar No. 157216)

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Email: bsandler@pszjlaw.com

ischarf@pszjlaw.com

jspomerantz@pszjlaw.com

Counsel to Plaintiff RDC Liquidating Trust

Dated: June 8, 2022

WICK PHILLIPS GOULD & MARTIN LLP

Catherine Curtis

Jason M. Rudd (TX Bar No. 24028786)

Catherine A. Curtis (TX Bar No. 24095708)

3131 McKinney Avenue, Suite 500

Dallas, TX 75204

Telephone: (214) 692-6200

Email: jason.rudd@wickphillips.com

catherine.curtis@wickphillips.com

*Counsel to Defendant Galderma Laboratories,
L.P.*

SO ORDERED:

DATED: _____, 2022

Rochester, New York

HON. PAUL R. WARREN

United States Bankruptcy Judge